UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE TURQUOISE HILL RESOURCES LTD. SECURITIES LITIGATION

Case No. 1:20-cv-08585-LJL

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the Declaration of Corey Worcester and the exhibits attached thereto, and any other arguments or materials that the Court may consider before this motion is taken under submission by the Court, Defendants Rio Tinto plc, Rio Tinto Limited, Rio Tinto International Holdings Limited, Jean-Sébastien Jacques, and Arnaud Soirat will move this Court, before the Honorable Lewis J. Liman, at the United States Courthouse for the Southern District of New York, 40 Foley Square, New York, New York 10007, at a date and time to be set by the Court, for an order (1) pursuant to Federal Rule of Civil Procedure 12(b)(6), dismissing the Second Amended Consolidated Complaint (Dkt. 127); and (2) granting all such other and further relief as this Court may deem just and proper.

Response and reply papers are to be filed pursuant to the Court's Memo Endorsement of the briefing schedule set forth in the parties' joint letter (Dkt. 126) and Rule 6.1 of the Joint Local Civil Rules of the United States District Courts for the Southern and Eastern Districts of New York.

Respectfully submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Dated: October 19, 2021 /s/ Corey Worcester

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